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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103

**SUBJECT:** Review of Bally Subslab and Indoor Air Data, Facility

**FROM:** Jennifer Hubbard, Toxicologist *JRH*  
Technical Support Branch (3HS41)

**TO:** Mitch Cron, RPM  
Western PA and MD Remedial Branch (3HS22)

**DATE:** 5/30/2006

I have reviewed the above document with particular attention to toxicological and risk assessment issues. The calculations in the memo were correct. The following items should be considered in the interpretation of these calculations:

1. The memo cites PADEP MSC-IAQs and EPA RBCs. It should be noted that both of these were listed at Hazard Quotients of 1, and did not consider additive effects. Furthermore, the PADEP MSCs were listed at a cancer risk of  $1E-5$  while the RBCs use  $1E-6$ . However, the risk calculations shown in the memo did consider total cancer and noncancer risks.
2. At L&Z Storage, Stauffer, and Gregory's Woodworking, the acceptability of the indoor air concentrations is dependent either on a low frequency of use (L&Z) or a significant amount of attenuation (Gregory's, Stauffer). If conditions change, the risks could increase. It should be particularly noted that at Stauffer, the earlier subslab concentrations were about 3X higher than the 2006 results.
3. FYI, if one were to calculate TCE attenuation factors from the 2006 data, they would range from 0.000004 (at Gregory's) to 0.3 (Office Area basement). An attenuation factor of 0.4 could be calculated for 111TCA at L&Z. However, it should be noted that these attenuation factors could be biased high if there are indoor sources of any of these chemicals.

If you have any questions concerning this review, please call me at x3328.

cc: Eric Johnson (3HS41)  
Kathy Davies (3HS41)